

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF RAM ANTHONY MOHABIR

I, Ram Anthony Mohabir, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Affidavit are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I worked as an operations engineer with ABM Engineering Services, located in the North Tower of the World Trade Center.

4. When the first passenger jet struck the North Tower, I had been working in the machine room on the 75th floor of the building only five floors below the area of impact. I then felt the incredible force and impact of the blast. I immediately decided to evacuate the building. I started running down the nearest stairwell to escape the North Tower. As I made my way down the stairwell, I stopped at various floors to notify people to evacuate the building. As I continued to quickly run down the stairs to escape the building, I tripped and fell into a concrete wall in one

of the landings. As I slammed into the concrete wall I suffered traumatic injuries to my head, back, neck, right shoulder, and both wrists. Further, people then trampled over me as I stumbled in the stairwell landing, causing further injury to my body. But despite my injuries, I managed to get back up to my feet and continue down the stairs to exit the building.

5. As I arrived at the bottom of the stairwell and exited the building at the plaza level, I was knocked to the ground by the force of the blast of the second airplane crashing into the South Tower. As I stood back up, I felt an incredibly loud ringing sensation in both of my ears from the explosion, and I saw the remains of dead bodies lying all around me. The scene looked like a war zone. I had to jump over dead bodies and avoid the bodies of those victims who were jumping from the North and South Towers in order to escape from the area. I also helped people up that had fallen down as I ran away from the scene.

6. After running for a few blocks away from the World Trade Center area, I collapsed from pure exhaustion. As I then picked myself up to begin running again, the South Tower collapsed and a thick cloud of dust, glass flakes, and building debris surrounded me. Due to the density of the debris cloud, I felt like I could not breathe, and I inhaled large quantities of the debris toxins. My eyes also began to burn from the exposure to the debris cloud.

7. I began to hold hands with people around me so that we could stick together and find our way through the thick dust cloud. I heard a police officer with a bullhorn ask us to walk towards the flashing lights. I walked towards the sound and lights while holding hands with other survivors. This process continued until I reached an area of clean air around the Hudson River.

8. Once I arrived at the Hudson River, a police officer in an unmarked car gave myself and other injured survivors a ride to Bayonne Hospital in New Jersey. At the hospital, I immediately received treatment for my immediate 9/11 injuries.

9. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: post-concussion syndrome with lingering memory deficits and headaches; bilateral hearing loss and the use of a hearing aid in my left ear; cervical, thoracic, and lumbar sprains; internal derangement of the right shoulder that resulted in rotator cuff surgery in 2012; corneal injuries to both eyes; bilateral carpal tunnel syndrome in both wrists; chronic obstructive pulmonary disease (COPD); asthma; reactive airways dysfunction syndrome (RADS); chronic respiratory disorder; and obstructive sleep apnea. Due to the above injuries and my physical limitations, I am now totally disabled.

10. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events almost daily, triggered by certain smells, sounds and views. I have been diagnosed with a major depressive disorder with recurrence, post-traumatic stress disorder (PTSD), an anxiety disorder, and a panic disorder. I constantly experience flashbacks and nightmares related to the horrific events of 9/11. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day. I have been deemed totally disabled by the Social Security Administration due to my physical limitations as discussed above and my emotional injuries.

11. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

12. Attached as Exhibit C to this Declaration is a true and correct copy of my correspondence from the September 11th Victim Compensation Fund dated September 11, 2013,

and October 25, 2016, in which the Fund and Special Master Rupa Bhattacharyya confirmed my eligibility for compensation for my physical injuries related to the above terrorist attacks on 9/11.

13. As noted above, I previously pursued a claim through the September 11th Victim Compensation Fund (Claim Number VCF0013536) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 7th day of April 2021.


Declarant Ram Anthony Mohabir

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**